

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

ZOHO CORPORATION,

Plaintiff,

V.

Civil Action No. 1:22-cv-37-LY

LIBERTY PEAK VENTURES, LLC,

Defendant.

LIBERTY PEAK VENTURES, LLC,

Counterclaimant,

V.

ZOHO CORPORATION,

Counter-Defendant,

and

ZOHO CORPORATION PVT. LTD.

Third-Party Defendant.

**JOINT MOTION FOR LEAVE TO EXCEED PAGE LIMITS
FOR CLAIM CONSTRUCTION BRIEFS**

Defendant/Counterclaimant Liberty Peak Ventures, LLC and Plaintiff/Counter-Defendant Zoho Corporation Pvt. Ltd. and Third-Party Defendant Zoho Corporation (collectively, the “Parties”), by and through their respective counsel, jointly submit this Motion for Leave to Exceed Page Limits for Claim Construction Briefs.

The parties in this action are scheduled to submit opening claim construction briefs on January 6, 2023 and reply claim construction briefs on February 6, 2023. There are three patents

at issue in this litigation. To address all the issues that the parties have identified for claim construction, the parties agree that the page limit for the opening and responsive briefs should be increased to 25 pages.

Accordingly, the Parties request that the Court approve the attached Order granting this Motion to Exceed Page Limits for Claim Construction Briefing.

Dated: January 5, 2023

/s/ Matthew C. Acosta

Matthew C. Acosta

Texas Bar No. 24062577

macosta@pcrfirm.com

Andrew Lin

Texas Bar. No. 24092702

alin@pcrfirm.com

Nicholas C. Kliewer

Texas Bar No. 24083315

nkliwer@pcrfirm.com

PLATT CHEEMA RICHMOND PLLC

1201 N. Riverfront Blvd., Suite 150

Dallas, Texas 75207

214.559.2700 Main

214.559.4390 Fax

**COUNSEL FOR LIBERTY PEAK
VENTURES, LLC**

Respectfully submitted:

/s/ Phillip J. Haack

Phillip J. Haack (admitted *pro hac vice*)

phaack@martonribera.com

Ryan Marton (admitted *pro hac vice*)

ryan@martonribera.com

**MARTON RIBERA SCHUMANN & CHAN
LLP**

548 Market Street, Suite 36117

San Francisco, CA 94104

Telephone: (415) 360-2515

Darryl Adams

dadams@sbgfirm.com

SLAYDEN GRUBERT BEARD PLLC

401 Congress Ave., Ste. 1650

Austin, Texas 78701

Telephone: (512) 402-3550

Facsimile: (512) 402-6865

**COUNSEL FOR ZOHO CORPORATION
AND ZOHO CORPORATION PVT. LTD.**

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Phillip J. Haack
Phillip J. Haack